

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

vs.

*

JKB-23-147

KARA GASPER

*

Defendant

*

MOTION TO EXTEND DEADLINE FOR FILING PRETRIAL MOTIONS

Defendant Kara Gasper, by and through her attorney, John M. McKenna, and Brennan, McKenna & Lawlor, Chtd., respectfully requests that this Honorable Court continue the deadline for the filing of pretrial motions in this case. In support of this Motion, counsel states the following.

1. On April 26, 2023, the Government filed a one-count Indictment charging Kara Gasper with possession with intent to distribute 50 grams or more of methamphetamine, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A). (ECF No. 1.) The charge at issue relates to the October 5, 2022 execution of a federal search warrant at Ms. Gasper's residence in Baltimore, Maryland. Ms. Gasper made her initial appearance on May 17, 2023. On October 17, 2024, the undersigned counsel was appointed to represent Ms. Gasper under the Criminal Justice Act.¹

¹ Ms. Gasper had previously been represented by attorney Laura Abelson of the Office of the Federal Public Defender and then by attorney Natalie Finegar, who was appointed under the Criminal Justice Act.

2. Immediately after being appointed to the case, the undersigned counsel reached out to prior counsel for Ms. Gasper to request the discovery material. Counsel also reached out to the Government to seek the Government's position on a request for a pre-plea PSR report. The Government indicated that it did not object to the request for a pre-plea PSR and that it would reproduce the discovery if the undersigned did not receive it from prior counsel. The Government also forwarded counsel a plea offer that had been extended to Ms. Gasper through prior counsel. In light of the fact that prior counsel was engaged in a murder trial, on October 21, 2024, the undersigned asked the Government to reproduce the discovery materials. On October 29, 2024, the Government shared certain discovery materials through a file sharing platform. The undersigned counsel began the process of reviewing the production and meeting with Ms. Gasper. In November and early-December 2024, counsel was engaged in a lengthy murder trial in the Circuit Court for Charles County. On December 17, 2024, counsel requested supplemental discovery from the Government. In particular, counsel requested the copies of the residential search warrant giving rise to this case as well as discovery related to the execution of the residential search warrant. On December 23, 2024, the Government responded by indicating that it believed that everything that had been produced to prior counsel was already produced to the undersigned counsel.

3. On January 9, 2025, the undersigned counsel sent a detailed supplemental request for discovery. In that communication, counsel requested copies of warrants that permitted law enforcement to track Ms. Gasper's vehicle as well as copies of the residential search warrant. On January 13, 2025, the Government produced additional discovery, including the requested paperwork for the 2022 search warrants. Counsel continued to review the voluminous materials, discuss them with Ms. Gasper, and investigate the case. Counsel also engaged the Government in plea discussions.

4. On April 29, 2025, in response to correspondence from the Government, the Court held a scheduling conference. On April 30, 2025, the Court issued a Scheduling Order. The Government was due to complete discovery by May 9, 2025. Ms. Gasper is due to file pretrial motions on or before June 2, 2025. At this time, Ms. Gasper respectfully requests that the Court extend the deadline within which to file pretrial motions through June 16, 2025.

5. The basis for this request is that on May 29, 2025, the Government produced additional discovery. The Government produced this discovery in response to a May 14, 2025 request from the undersigned counsel. On that date, counsel identified for the Government certain categories of unproduced materials related to the October 5, 2022 execution of the residential search warrant and the aftermath of that search. The undersigned counsel made the request after learning that requested

materials contained potentially exculpatory information. On the evening of May 29, 2025, the Government produced a number of documents in response to counsel's request. Counsel has started his review of those materials, which include *Brady* information. On May 30, 2025, counsel reached out to the Government to request additional discovery as well as previously requested materials that have not yet been received. Counsel must fully review the May 29 production as well as any forthcoming production in order to prepare pretrial motions in this case.

6. This Motion is not filed for the purpose of delay. This Court made clear at the April 29 status conference that this case needs to move towards a resolution. A jury trial has been scheduled. Counsel is diligently reviewing the discovery and conducting an investigation into the case. However, the May 29 production is significant. It has raised serious questions about this case. Counsel must investigate the matters generated by the production. Notably, though the Government has been in possession of the information disclosed on May 29 for more than two years, counsel only received it yesterday. Counsel worked swiftly to review the information and has made additional requests based on that review.² Under these circumstances, counsel requires additional time to prepare and file motions.

7. Counsel alerted the Government that he intended to seek an extension of the deadline within which to file pretrial motions. As of the filing of this Motion,

² Counsel has not yet had a chance to review the materials with Ms. Gasper.

counsel has not yet heard back with respect to the Government's position on the requested extension.

8. For these reasons, Ms. Gasper respectfully requests that this Court extend the deadline by which to file pretrial motions through June 16, 2025.

Respectfully submitted,

/s/

John M. McKenna
Brennan, McKenna & Lawlor, Chtd.
6305 Ivy Lane, Suite 700
Greenbelt, Maryland 20770
(301) 474-0044
jmckenna@brennanmckenna.com

CERTIFICATE OF SERVICE

I hereby certify that on this day, May 30, 2025, a copy of the foregoing sent via ECF to all parties.

/s/

John M. McKenna